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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

LOIS ROBINSON, an individual

Court Case No.: 2:13-cv-01708-JCM-GWF

Plaintiffs,

vs.

AMERICAN MEDICAL SYSTEMS, INC., a
Delaware corporation; AMERICAN
MEDICAL SYSTEMS HOLDINGS, INC., a
Delaware corporation; ENDO
PHARMACEUTICALS, INC., a Pennsylvania
corporation; ENDO PHARMACEUTICALS
HOLDINGS, INC. a Delaware corporation;
and ENDO HEALTH SOLUTIONS INC., a
Delaware corporation; and DOES 1-10 and
ROE ENTITIES 11-20, inclusive

District Court Case No. A-13-685017-C
District Court Dept. No. XVII

Defendants.

**STIPULATION AND ORDER TO STAY
PROCEEDINGS PENDING DECISION
REGARDING TRANSFER TO MDL**

The undersigned counsel of record for Defendants American Medical Systems, Inc., American Medical Systems Holdings, Inc., Endo Pharmaceuticals, Inc., and Endo Health Solutions Inc. (formerly known as Endo Pharmaceuticals Holdings, Inc.) (collectively “Defendants”) and Lois Robinson (“Plaintiff”) hereby stipulate and agree to stay these proceedings pending a decision from the Judicial Panel on Multidistrict Litigation (“JPML”) based on the foregoing:

1. The above-entitled action was commenced in the Eighth Judicial District Court, in and for Clark County, Nevada, Case No. A-13-685017-C (“State Court Action”).

1 2. Plaintiff Lois Robinson commenced the State Court Action by filing a complaint
 2 ("Complaint") on July 11, 2013. Plaintiff filed an Amended Complaint ("Amended Complaint") on
 3 September 5, 2013.

4 3. Counsel for Defendants accepted service of the Amended Complaint as to all
 5 Defendants on September 6, 2013.

6 4. Notice of Removal to the United States District Court For the District of Nevada was
 7 filed by Defendants on September 18, 2013.

8 5. The Judicial Panel on Multidistrict Litigation ("JPML") has established four separate
 9 Multi-District Litigation proceedings ("MDL") for claims related to pelvic mesh products, including
 10 the devices at issue here. There are more than 17,000 cases like this one in *In re: American Medical
 11 Systems, Inc., Pelvic Repair System Products Liability*, MDL 2325 (the "AMS MDL") pending in
 12 the United States District Court for the Southern District of West Virginia for coordinated pretrial
 13 proceedings under 28 U.S.C. § 1407.

14 6. Defendants are seeking the transfer of this action to the AMS MDL and have
 15 provided the JPML notice of this action pursuant to the "tag-along" procedure contained in the
 16 MDL Rules.

17 7. Defendants and Plaintiff hereby agree to a stay of the instant proceedings pending a
 18 decision regarding transfer by the JPML.

19 Dated this 25th day of September, 2013

19 Dated this 25th day of September, 2013

20 GREENBERG TRAURIG, LLP

20 EGLET WALL CHRISTIANSEN

21 /s/ Kara B. Hendricks
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21 /s/ Erica D. Entsminger
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 Attorneys for Plaintiff

25 IT IS SO ORDERED this 4th day of October, 2013:

26 
 27 GEORGE FOLEY, JR.
 28 United States Magistrate Judge